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BEFORE THE ARIZONA CORPORATION COMMISSION

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Chairman

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Commissioner

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Arizona Corporation Commission

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AZ CORP COMMISSION  
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IN THE MATTER OF RULES TO  
ADDRESS SLAMMING AND OTHER  
DECEPTIVE PRACTICES

DOCKET NO. RT 00000J-99-0034

**RESPONSE OF COMMENTS OF AT&T TO STAFF'S  
SUPPLEMENTAL COMMENTS DATED JULY 12, 2002**

AT&T Communications of the Mountain States, Inc. ("AT&T") submits the following response to the Staff's Supplemental Comments filed July 12, 2002.

**I. Script Submission**

The revisions proposed by Staff are helpful and allow carriers to better understand what scripts must be submitted to the Commission under proposed R14-2-1914 and R14-2-2012. AT&T nonetheless objects to any required submission of confidential and proprietary scripts where there is no allegation of wrongdoing or consumer confusion. This requirement imposes costly and unnecessary compliance burdens on companies that are currently facing extraordinary financial challenges. The Commission has authority to request that a carrier submit, under seal, all relevant marketing scripts in the course of a complaint proceeding. The annual submission of all marketing scripts will unnecessarily stress the resources of both the telecommunications industry and the Commission.

## **II. R14-2-2005(D) “basic local exchange service”**

AT&T Supports the Supplement Comments of Staff which limit “the cost of ‘basic local exchange telephone service’” announcement to contacts where telephone service is initially requested or offered. AT&T asks that the Hearing Officer further revise this rule to add “residential” immediately before “service” each time it appears in the revised paragraph. The rule would then read as follows:

During each contact in which the Telecommunication Company offers to establish residential service or during which a person requests the establishment of residential service, the Telecommunications Company shall inform the subscriber of the cost of “basic local exchange telephone service” as defined in R14-2-1201(6), if provided. A Telecommunications Company shall not use any misleading language in describing any product or service. The term “basic” may only be used for a plan that includes only basic local exchange telephone service.

Limiting this requirement to residential subscribers allows the Commission to achieve its consumer protection goals, while eliminating confusion that will ensue if the rule applies to both residential and business customers. As the rule currently reads, if Bud’s Auto Shop calls for business service, the customer representative will have to begin by informing Bud of the cost of a basic one-party residential line (as defined in R14-2-1201(6). Rule 14-2-1201(6) is defined, inter alia, as “1-party residential service with a voice grade line” and does not include business services. Requiring carriers to inform business subscribers of the cost of basic residential service is not necessary to the Commission’s overall goal of protecting consumers from unauthorized carrier changes and charges.

Respectfully submitted this 24<sup>th</sup> day of July 2002.

AT&T COMMUNICATIONS OF THE  
MOUNTAIN STATES, INC.

A handwritten signature in dark ink, appearing to read "Joan S. Burke", is written over a horizontal line.

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## CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of Comments Of AT&T On Proposed Slamming and Cramming Rules, were hand delivered on this 24<sup>th</sup> day of July 2002, to:

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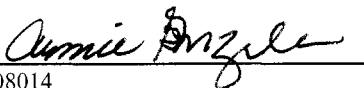
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